1	Jane G. Kearl (CA 156560) Colin C. Holley (CA 191999)	
2	WATT, TIEDER, HOFFAR & FITZGERALD, L. 2040 Main Street, Suite 300	L.P.
3	Irvine, CA 92614 Telephone: 949-852-6700	
4	Facsimile: 949-261-0771	
5	Email: jkearl@watttieder.com cholley@watttieder.com	
6	Attorneys for Creditor Barnard Pipeline, Inc.	
7	•	DANAPHDECK COUDE
8		BANKRUPTCY COURT CRICT OF CALIFORNIA
9		CISCO DIVISION
10	In re:	Bankruptcy Case
11	PG&E CORPORATION,	Case No. 19-30088 (DM) Chapter 11
12	-and-	(Lead Case) (Jointly Administered)
13	PACIFIC GAS AND ELECTRIC COMPANY,	(Johnly Frammistered)
14	Debtors.	
15	☐ Affects PG&E Corporation	NOTICE OF CONTINUED PERFECTION
16	☐ Affects Pacific Gas and Electric Company	OF MECHANICS LIEN PURSUANT TO 11
		U.S.C. § 546(b)(2)
17	□ Affects both Debtors	Contra Costa County (Lien 20190010685)
	 ☑ Affects both Debtors * All papers shall be filed in the Lead Case, 	
	□ Affects both Debtors	
18	 ☑ Affects both Debtors * All papers shall be filed in the Lead Case, 	
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18 19 20	 Affects both Debtors * All papers shall be filed in the Lead Case, No. 19-30088 (DM) Barnard Pipeline, Inc. ("Barnard"), b 	Contra Costa County (Lien 20190010685)
18 19 20 21	* Affects both Debtors * All papers shall be filed in the Lead Case, No. 19-30088 (DM) Barnard Pipeline, Inc. ("Barnard"), b notice of continued perfection of its mechanic	Contra Costa County (Lien 20190010685) y and through its undersigned counsel, hereby gives
18 19 20 21 22	* Affects both Debtors * All papers shall be filed in the Lead Case, No. 19-30088 (DM) Barnard Pipeline, Inc. ("Barnard"), b notice of continued perfection of its mechanic 1. Barnard has provided and deli	Contra Costa County (Lien 20190010685) y and through its undersigned counsel, hereby gives as lien under 11 U.S.C. § 546(b)(2), as follows:
18 19 20 21 22 23	 ■ Affects both Debtors * All papers shall be filed in the Lead Case, No. 19-30088 (DM) Barnard Pipeline, Inc. ("Barnard"), be notice of continued perfection of its mechanical. Barnard has provided and delighted the construction and improvements of projections. 	Contra Costa County (Lien 20190010685) y and through its undersigned counsel, hereby gives es lien under 11 U.S.C. § 546(b)(2), as follows: vered labor, services, equipment, and/or materials for
18 19 20 21 22 23 24	 ■ Affects both Debtors * All papers shall be filed in the Lead Case, No. 19-30088 (DM) Barnard Pipeline, Inc. ("Barnard"), be notice of continued perfection of its mechanical. Barnard has provided and delighted the construction and improvements of projections. 	Contra Costa County (Lien 20190010685) y and through its undersigned counsel, hereby gives as lien under 11 U.S.C. § 546(b)(2), as follows: wered labor, services, equipment, and/or materials for acts located in the County of Contra Costa, State of action for which is set forth in the Claim of Mechanics
18 19 20 21 22 23 24 25	* All papers shall be filed in the Lead Case, No. 19-30088 (DM) Barnard Pipeline, Inc. ("Barnard"), be notice of continued perfection of its mechanical. Barnard has provided and delighted the construction and improvements of projection California (the "Property"), the legal description, a true copy of which is attached hereto	Contra Costa County (Lien 20190010685) y and through its undersigned counsel, hereby gives as lien under 11 U.S.C. § 546(b)(2), as follows: wered labor, services, equipment, and/or materials for acts located in the County of Contra Costa, State of action for which is set forth in the Claim of Mechanics

of Title 11 of the United States Code (the "<u>Bankruptcy Code</u>") on January 29, 2019 (the "<u>Petition</u> <u>Date</u>").

- 3. On January 25, 2019, before the Petition Date, Barnard properly and timely recorded its Mechanics Lien under California Civil Code § 8400, *et seq.* in the Official Records of Contra Costa County, State of California.
- 4. Through January 25, 2019, the amount owing to Barnard subject to its Mechanics Lien is at least \$203,487.48, exclusive of accruing interest and other charges, and additional amounts which have continued and are continuing, to accrue after the Petition Date.
 - 5. California Civil Code § 8460(a) provides that:

The claimant shall commence an action to enforce a lien within 90 days after recordation of the claim of lien. If the claimant does not commence an action to enforce the lien within that time, the claim of lien expires and is unenforceable[.]

- 6. Pursuant to California Civil Code § 8460, an action to enforce a lien must be commenced within 90 days after recordation of the claim of lien. However, section 362 of the Bankruptcy Code automatically stays Barnard from filing a state court action to enforce its mechanics lien. See 11 U.S.C. § 362.
 - 7. Section 546(b)(2) of the Bankruptcy Code provides that when applicable law

... requires seizure of such property or commencement of an action to accomplish such perfection, or maintenance or continuation of perfection of an interest in property; and ... such property has not been seized or such an action has not been commenced before the date of the filing of the petition; such interest in such property shall be perfected, or perfection of such interest shall be maintained or continued, by giving notice within the time fixed by such law for such seizure or such commencement.

- See 11 U.S.C. § 362; see also Village Nurseries v. Gould (In re Baldwin Builders), 232 B.R. 406, 410-11 (9th Cir. 1999); Village Nurseries v. Greenbaum, 101 Cal.App.4th 26, 41 (Cal. Ct. App. 2002).
- 8. Accordingly, Barnard hereby provides notice of its rights as a lienholder in the Property pursuant to California's mechanics lien law. Barnard is filing and serving this notice to perfect, preserve, maintain, and continue the perfection of its lien and its rights in the Property to

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comply with the requirements of California state law, 11 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), and any other applicable law. This notice constitutes the legal equivalent of having recorded a mechanics lien in the recorder's office for the county where the Property is located and then having commenced an action to foreclose the lien in the proper court. By this notice, the Debtors and other parties in interest are estopped from claiming that the lawsuit to enforce Barnard's mechanics lien was not timely commenced pursuant to applicable state law. Barnard intends to enforce its lien rights to the fullest extent permitted by applicable law. The interests, perfected, maintained, or continued by 11 U.S.C. § 546(b)(2) extend in and to the proceeds, products, offspring, rents, or profits of the Property.

- 9. The filing of this notice shall not be construed as an admission that such filing is required under the Bankruptcy Code, the California mechanics lien law, or any other applicable law. In addition, Barnard does not make any admission of fact or law, and Barnard asserts that its lien is senior to and effective against entities that may have acquired rights or interests in the Property previously.
- 10. The filing of this notice shall not be deemed to be a waiver of Barnard's right to seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of any other rights or defenses.
 - 11. Barnard reserves all rights, including the right to amend or supplement this notice.

Dated: April _______, 2019

WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.

By:

Jane G. Kearl (CA 156560) Colin C. Holley (CA 191999) 2040 Main Street, Suite 300

Irvine, CA 92614

Telephone: 949-852-6700 Facsimile: 949-261-0771

Email: jkearl@watttieder.com cholley@watttieder.com

Attorneys for Creditor Barnard Pipeline, Inc.

ATTORNEYS AT LAW
IRVINE

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2019, I caused a copy of the foregoing Notice of Continued Perfection of Mechanics Lien Pursuant to 11 U.S.C. § 546(b)(2) to be sent via e-mail and/or first-class mail to the parties identified in the Master Core/2002 Service List attached hereto as Exhibit B.

Jane/G. Kearl

FITZGERALD, L.L.P. ATTORNEYS AT CASE: 19-30088 Doc# 1387 Filed: 04/15/19 NOTICE OF CONTINUED PERFECTION OF

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WATT, TIEDER, HOFFAR & FITZGERALD, LCASSE ATTORNEYS AT LAW	e: 19-30088	Doc# 1387	Filed: 04/15/19 19	NOTICE OF CONTINUED PERFECTION OF Entered: NOTICE 1:EN: 88 RS PANE TO OF U.S.C. §

Recording requested by: Barnard Pipeline, Inc.

And when recorded mail this document to:

Jane G. Kearl, Esq. Robert C. Shaia, Esq. Watt, Tieder, Hoffar & Fitzgerald, LLP 2040 Main Street, Suite 300 Irvine, CA 92614



CONTRA COSTA Co Recorder Office

JOSEPH CANCIAMILLA, Clerk - Recorder

D0C - 2019 - 0010685 - 00

Check Number 2764
Friday, JAN 25, 2019 09:01:00
MOD \$3.00|REC \$13.00|FTC \$2.00
DAF \$2.70|REF \$0.30|RED \$1.00
ERD \$1.00|SB2 \$75.00|
TII Pd \$98.00 Nbr-0003391179



AAR / R8 / 1-3

MECHANICS' LIEN (Cal. Civ. Code § 8416, et seq.)

1. BARNARD PIPELINE, INC. ("Claimant") claims a mechanics lien for the labor, services, equipment and/or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the County of Contra Costa, State of California, and more particularly described as:

All right, title and interest of Pacific Gas and Electric Company ("PG&E") in, at or near the Clayton Regulator Station, located approx.. 30 yards west of the intersection of Clayton Road and Allegro Avenue, Concord, CA, Lat: 37.952640, Long: -121.959269, and all appurtenances and easements related thereto, including specifically, without limitation, all PG&E's interest in all improvements, structures, and pipelines in or on which Claimant provided labor, services, equipment, and/or materials as set forth in paragraph 2.

- 2. After deducting all just credits and offsets, the sum of \$203,487.48, together with interest at the rate of 10% per annum from 1/21/19 is due Claimant for the following labor, services, equipment and/or materials for installation of cathodic test stations on high pressure natural gas pipelines, and related construction work performed under the Alliance Agreement between Claimant and PG&E, and the Contract Work Authorization No. C4626 for UID#s 40401 40115 40114 40404 40400 40397 40405 40110 40111 40407 40112 40113 40408 40409 40396 40058 40059 40060, or otherwise requested by PG&E.
- 3. Claimant furnished the labor, services, equipment and/or materials, at the request of: Pacific Gas and Electric Company.
- 4. The name and address of the owner(s) or reputed owner(s) of the real property is/are: PG&E, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

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5. Claimant's address is: 701 Gold Avenue, Bozeman, MT 59715.

Dated January 22, 2019

BARNARD PIPELINE, INC.

y: Zoob Bowler V

Zach Bowler, Vice President

VERIFICATION

I, Zach Bowler, am the Vice President of Claimant on the foregoing Mechanics Lien and am authorized to make this verification for and on its behalf. I have read the foregoing Mechanics Lien and know the contents of the Mechanics Lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated Jamery ZZ 2019

Zach Bewler Vice President

NOTICE OF MECHANICS LIEN

ATTENTION!

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS STATE LICENSE BOARD WEB SITE AT www.cslb.ca.gov.

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PROOF OF SERVICE

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I, Julie Benton, declare:

I am employed in the County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is 2040 Main Street, Suite 300, Irvine, California 92614-6232.

On January 23, 2019, I served \(\subseteq \) the originals \(\subseteq \) true copies of the following document(s) described as MECHANICS LIEN and NOTICE OF MECHANICS' LIEN on the interested parties in this action, by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Irvine, California addressed as set forth below:

Pacific Gas & Electric Company (PG&E) 77 Beale Street, 32nd Floor San Francisco, CA 94105

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 23, 2019, at Irvine, California.

June But

WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.

-										EAdler (2) The Adler Firm. Com
Cound for Mirna Trettevik, including other Fire Victing or Calmants	ADLER LAW GROUP, APLC	Attn: E. Elliot Adler, Geoffrey E. Marr, Brittany S. Zummer	402 West Broadway	Suite 860	San Diego	5	92101	619-531-8700	8519-342-9600 bzummer	gemarr59@hotmail.com bzummer@TheAdlerFirm.com
Counsel for Aera Energy LLC, Midway Sunset	Anna Canada Canada	Bon A Comme	10000 Mine Superior		Bakareflafd	9	93311	661-665-5791	RASvmm	RASverm@aeraenergv.com
Auguno company	אבום בוובו לא דרך	ALLE NOT SESSION	601 West Fifth Street, Suite		Scarce	S	*******			
Counsel to TRANSWESTERN PIPELINE COMPANY, LLC	AKERMAN LLP	- 1	300		Los Angeles	5	1,000	213-688-9500	213-627-6342 evelina ge	evelina gentry@akerman.com
Counce TRANSWESTERN PIPELINE COMPANY, LLC	AKERMAN 1LP	Attn: JOHN E. MITCHELL and YELENA ARCHIYAN	2001 Ross Avenue, Suite 3600		Dallas	۲Ł	75201	214-720-4300	yelena an 214-981-9339 john.mitc	yelena archiyan@akerman.com john.mitchell@akerman.com
Councle be the Ad Hoc Committee of Senior Unsecured Notel Octon Ontel Octob	d Akin Gump Strauss Hauer & Feld LLP	Attn: Ashley Vinson Crawford	580 California Street	Suite 1500	San Francisco	ర	94104	415-765-9500	415-765-9501 avcrawfo	avcrawford@akingump.com
Coun. (Co.) the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	d Akin Gump Strauss Hauer & Feld LLP	Attn: David P. Simonds	1999 Avenue of the Stars	Suite 600	Los Angeles	đ	29006	310-229-1000	310-229-1001 dsimonds	dsimonds@akingump.com
Counsel to the Ad Hoc Committee of Senior Unsecured Notebraters of Pacific Gas and Electric Company		Attn: Michael S. Stamer, Ira S. Dizengoff, David H. Botter	One Bryant Park		New York	AN	10036	212-872-1000	mstamer idizengof 212-872-1002 dbotter@	mstamer@akingump.com idizengoff@akingump.com dbotter@akingump.com
Course to Agaianian. Inc.	ANDREWS & THORNTON	Attn: Anne Andrews, Sean T. Higgins, and John C. Thornton	4701 Von Karman Ave	Suite 300	Newport Beach	3	92660	949-748-1000	1.0	shiggins@andrewsthornton.com jct@andrewsthornton.com aa@andrewsthornton.com
Counse Boke, NA, solely in its capacity as	APENT CAVII D	Attn: Andrew I, Silfen, Beth M.	1301 Avenue of the	42nd Floor	New York	È	10019	212.484-3900		Andrew, Silfen@arentfox.com Beth, Brownstein@arentfox.com Jordana, Renert@arentfox.com
indenture il Datee Counsel for Genesys Telecommunications Laboratories		Attn: Andy S. Kong and Christopher K.S.	-	1200		: 6	3501 61000	0007.003.616	1 7	andy kong@arentfox.com
Counsel for BOKF, NA, solely in its capacity as	Arent Fox LLP	Wong	SSS West Fifth Street	48th Floor	Los Angeles	5 8	90013-1065	213-629-7400		Aram Ordubegian@arentfox.com
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1100	Attornay General of California	Attn: XAVIER BECERRA, MARGARITA	1515 Clay Street, 20th Floor	P.O. Box 70550	Oakland	ర	94612-0550	510-879-0815	James Po 510-622-2270 Margarit	James Potter@doj.ca gov Marparita Padilla@doj ca pov
Concerns state Agencies	Attorney General of California	Attn: XAVIER BECERRA, MARGARITA PADILLA, and JAMES POTTER	300 South Spring Street	Suite 1702	Los Angeles	5	90013	213-269-6326	213-897-2802 James Po	James Potter@doj ca.gov
Special Bankruptcy Counsel for Certain Fire Damage Plaintiffs Claimants	BAILEY AND ROMERO LAW FIRM	Attn: MARTHA E. ROMERO	12518 Beverly Boulevard		Whittier	5	90601	562-889-0182	marthae	marthaeromerolaw@gmail.com
Proposed Counsel for Official Committee of Tort	011 03 H31301 0 03940	Arrest Cale Canadestral Louise T. Arrant 11501 Wilchies Blud	11601 Wilshire Blud	Suite 1400	Ins Angeles	5	90025-0509	310-442-8875	310-820-8859 lattard@	esagerman@bakerlaw.com lattard@bakerlaw.com
Proposed Counsel for Official Committee of Tort	BAKER & HOSTETIER IIP	Atte. Robert & Inlian Cerily & Dimas 1160 Battery Street	1160 Battery Street	Suite 100	San Francisco	5	94111	415-542-8730		rjulian@bakerlaw.com cdumas@bakerlaw.com
Counter of the Senergy Inc., Clearway Energy, Inc., and Control of the Senergy	Baker Botts L.I. P.	Attn: C. Luckey McDowell, lan E. Roberts, Kevin Chiu	2001 Ross Avenue	Suite 1000	Selled	ĭ	75201	214-953-6500	Luckey.N Ian.Robe Kevin.Ch	Luckey. Mcdowell@BakerBotts.com Ian.Roberts@BakerBotts.com Kevin. Chiu@BakerBotts.com
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URENCOLIMITED and Louisiana Energy Services, LLC	Ballard Spahr LLP	Attn: Brian D. Huben	2029 Century Park East	Suite 800	Los Angeles	প্ৰ	90067-2909	424-204-4353	424-204-4350	hubenb@ballardspahr,com
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Discopery Hydrovac Description and Louisiana France Carriese 110	BALLARD SPAHR LIP	Myers Attn: Matthew G Summers	1 East Washington Street 919 North Market Street	11th Floor	Wilmington	DE	19801	302-252-4428	410-361-8930 summers	summersm@ballardspahr.com
for Bank of America, N.A.	Bank of America		Mail Code: NY1-100-21-01	+	New York	Ν	10036	646-855-2464		John.mccusker@bami.com
Counted for Creditors Public Entities Impacted by the Wildfires	Baron & Budd, P.C.	ohn Fiske	3102 Oak Lawn Avenue #1100		Dallas	Ĕ	75219	214-521-3605	ssummy iffske@b	ssummy@baronbudd.com jfiske@baronbudd.com
38	Barton Klieman & Oortine 11 P	Attn: Terry L. Higham, Thomas E. McCirroin, Christopher D. Higashi	350 South Grand Avenue, Suite 2200		Los Angeles	క	90071-3485	213-621-4000	tmccurni chigashid 213-625-1832 thigham	tmccurnin@bkolaw.com chigashi@bkolaw.com thigham@bkolaw.com
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Hor Subrogation Insurers	Berger Kahn, a Law Corporation	Attn: Craig S. Simon	1 Park Plaza, Suite 340	The same of the sa	Invine	5	24024	DATE	DAY-OLD JOHN THE	-

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Couns Le Frase Enterprises, Inc. dba Kortick	A STATE OF THE STA	200000000000000000000000000000000000000	THE STREET STREE							
Manufacturing Company	Brunetti Rougeau LLP	Attn. Gregory A. Rougeau	235 Montgomery Street	Suite 410	San Francisco	S.	94104	415-992-8940	415-992-8915	grougeau@briawst.com
CourseLor California Community Choice Association,	D. colonia de Bank Free State of Paris and Par	Attn: Valerie Bantner Peo, Shawn M.	To Constitution of the Con	17th Cloor	Can Grandiego	S	50105-2493	415-227-0900	415-227-0770	sciristianisoni@buchalter.com
California Public Utilities Commission	California Public Utilities Commission	Attn: Arocles Aguilar	505 Van Ness Avenue	DOLL IN CO.	San Francisco	5 5	94102	415-703-2015	415-703-2262	arocles, aguilar@couc.ca.gov
Counsal to Chevron Products Company, a division of	CHEVRON PRODUCTS COMPANY, A DIVISION									melaniecruz@chevron.com
Chevro V.S.A. Inc.	OF CHEVRON U.S.A. INC.	Attn: Melanie Cruz, M. Armstrong	6001 Bollinger Canyon Road 72110	72110	San Ramon	S	94583			marmstrong@chevron.com
Interestery Party California Community Choice Association	Clark & Trevithick	Attn: Kimberly S. Winick	800 Wilshire Boulevard	12th Floor	Los Angeles	8	90017	213-629-5700	213-624-9441	213-624-9441 kwinick@clarktrev.com
Course (or XI insurance America, inc, Albertsons Computing, inc., Safeway Inc., Cattin Specialry Insurance Company, David W. Maehl, Rhonda J. Maehl, Sept. Surplus, Lines Insurance Company, Chubb Custom The Surplus, General Security Custom The Surplus of Antono (Scillor), Market Bernanda Limined a Alford Huschish	Charges Miller P. C.	atro-Michael W. Goodin	17901 Von Karman Avenue	Suite 650	Ivine	5	92614	949-260-3100	949-260-3190	
American secure secure secure secure		Attn: Lisa Schweitzer, Margaret								
	Cleary Gottlieb Sheen & Hamilton LLP	Schierberl	One Liberty Plaza		New York	N.	10006	212-255-2000	212-225-3999	mschierberl@cggsh.com
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the Carteria Superior Court in the North Bay Fire										
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In re: PGKE Corporation, e Master Service List Case No. 19-30088

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